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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ESTELA RAMIREZ,

Plaintiff,

V.

EXPERIAN INFORMATION SERVICES,  
INC. EQUIFAX INFORMATION SERVICES,  
LLC, TRANS UNION, LLC, and PLUSFOUR,  
INC.

## Defendants.

Case No.: 2:20-cv-00566-GMN-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANT  
PLUSFOUR INC. TO FILE ANSWER TO  
PLAINTIFF'S COMPLAINT**

**(FIRST REQUEST)**

Plaintiff, ESTELA RAMIREZ (“Plaintiff”) and Defendant PLUSFOUR, INC. (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. On March 23, 2020, Plaintiff filed his Complaint. Defendant, PLUSFOUR, INC, in the United States District Court, District of Nevada, titled *Estela Ramirez v. PlusFour, Inc.*, Case No. 2:20-cv-00566.

2. PlusFour, Inc was served the Plaintiff's Complaint on March 31, 2019 through a registered agent and acknowledged receipt of service.

3. Defendant PlusFour's deadline to answer was April 21, 2020.

4. Based on Governor Sisolak's declaration of a public health state of emergency in Nevada as a result of COVID-19, and the accompanying directive for non-essential businesses to shut down, PlusFour, Inc. has suspended operations.

5. In light of the COVID-19 pandemic and office closings, PlusFour, Inc. and its counsel require additional time to investigate and respond to the allegations and claims made by Plaintiff.

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1 Accordingly, the parties agree to grant PlusFour, Inc. an initial extension of the deadline to respond  
2 to Plaintiff's Complaint to May 27, 2020.

3       6. This Stipulation is made in good faith, not for the purposes of delay, and granting it will  
4 not prejudice any party. This extension of time will allow PlusFour, Inc. time to investigate the  
5 allegations and claims raised by Plaintiff's Complaint, confer with counsel, and prepare its  
6 response. This is Defendant PlusFour's first request for an extension of time.

7       7. On April 24, 2020, PlusFour, Inc.'s counsel conferred with Plaintiff's counsel regarding  
8 the basis for this request and its need for an extension. Plaintiff's counsel had no objections and  
9 approved for a 30 day extension to the request.

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1           WHEREAS, the parties hereby stipulate and agree, pursuant to LR IA 6-2, , that Defendant  
2 PlusFour's time to answer, move or otherwise respond to Plaintiff's Complaint in this action is  
3 extended through and including **May 27, 2020.**

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5 Dated this 30th day of April 2020.

6 **SHUMWAY VAN**

7 By: /s/ Garrett R. Chase

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12 *Attorneys for Co-Defendant*  
PlusFour, Inc

Dated this 30th day of April 2020

**KIND LAW**

By: /s/ Michael Kind

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*Attorneys for Plaintiff*  
Estela Ramirez

19  
20 **IT IS SO ORDERED**

21 **DATED: May 01, 2020**

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25 **BRENDA WEKSLER**  
26 **UNITED STATES MAGISTRATE JUDGE**

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Submitted by:

**SHUMWAY VAN**

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